

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

RAHUL DEV MANCHANDA,

Debtor

Chapter 7

Case No. 23-22095 (SHL)

Adversary Proceeding 24-07009



**DEBTOR REPLY AFFIRMATION IN OPPOSITION TO AUST GREGORY ZIPES**  
**STATEMENT OF MATERIAL UNDISPUTED FACTS PURSUANT TO**  
**LOCAL BANKRUPTCY RULE 7056-1 IN CONNECTION WITH THE UNITED**  
**STATES TRUSTEE'S COMPLAINT OBJECTING TO DEBTOR'S DISCHARGE**  
**PURSUANT TO 11 U.S.C. §§ 11 U.S.C. 727(a)(3), 727(a)(4)(A) AND 727(a)(5)**

TO: THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

The Debtor, Rahul Dev Manchanda, submits this Reply Affirmation in Opposition to AUST Gregory Zipes' Statement of Material Undisputed Facts Pursuant to Local Bankruptcy Rule 7056-1 in Connection with the United States Trustee's Complaint Objecting to Debtor's Discharge Pursuant to 11 U.S.C. §§ 11 U.S.C. 727(a)(3), 727(a)(4)(A) AND 727(a)(5) as follows:

**A. The Bankruptcy Filing With the Initial Petition, Schedules, and Statement of  
Financial Affairs**

1. "Debtor" should read "Debtor's attorney Bruce Bronson"
2. "Debtor" should read "Debtor's attorney Bruce Bronson"

3. "Debtor" should read "Debtor's attorney Bruce Bronson"
4. "Debtor" should read "Debtor's attorney Bruce Bronson"
5. "Debtor" should read "Debtor's attorney Bruce Bronson"
6. "Debtor" should read "Debtor's attorney Bruce Bronson"
7. "Debtor" should read as "Debtor's attorney Bruce Bronson" as Debtor doesn't know what a "consumer debt" is.
8. Debtor assumes his attorney Bruce Bronson knew what he was doing, Debtor can not verify electronic signatures, only wet ones.

#### **B. The Debtor's Home and Business Locations**

9. There is no zoning prohibition that the New Rochelle Property can not also be used as a small business home law office as well.
10. Yes, Debtor and his family also live at the location of his small business home law office, as well.
11. Monthly payments for Debtor home law office locations were changed from lease to mortgage payments when Debtor and his family moved from Manhattan to New Rochelle NY, 2 years after being approved for the SBA loan.

12. "Debtor" should read "Debtor's attorney Bruce Bronson"
13. "Debtor" should read "Debtor's attorney Bruce Bronson"
14. Debtor started a "virtual office location" there around August 2024 after 30 Wall Street and Trustee Salvatore Lamonica forced him out due to non-payment due to bankruptcy
15. Debtor no longer maintains the virtual office nor paid for the 173 Huguenot Street New Rochelle NY office because of disputes with Regus their parent company, so only had for a few days/weeks.

#### **C. The Debtor's Representation by Mr. Bronson in this Case**

16. No, Bruce Bronson in a drunken alcoholic rage tried to get me to pay him \$5000 per motion for the duration of the case, we could not afford this, so he withdrew and Judge Sean Lane allowed this - we are not certain of the date of official termination of legal services.
17. According to AUST Greg Zipes, Bruce Bronson was our official bankruptcy lawyer until April 20, 2023 as stated above, more than 2 months after his filing, not 1 month as AUST Greg Zipes lies above.

#### **D. The Debtor's Income and Expenses**

18. No, Manchanda Law Office PLLC was officially dissolved in November/December 2023 after filing for chapter 7 bankruptcy.
19. No, Law Office Managers have exclusively handled the law firm finances after Debtor had a heart attack in August 2019.
20. AUST Greg Zipes once again uses hyperbole and exaggeration, if not deception here, because Debtor never stated that he "worked with Senior Cromwell," whatever that means, and Debtor never said "so good that he wanted me to do his tax returns" as it was a class assignment.
21. AUST Zipes makes another false statement - Debtor of course DID maintain books and records of his business, and gave whatever he had to AUST Zipes in a timely fashion - they also exist today in storage at "Piece of Cake" moving and storage in New York City, and AUST Zipes is still free to go whenever he chooses, just like he was since we filed these bankruptcy cases in February 2023 at our 30 Wall Street address.
22. Yes during the tax return season it was Debtor's practice to send any and all original receipts, diaries, financials, bank statements, checks to our bookkeeper/CPA/accountants for tax return preparation.
23. A Schedule C tax return allows certain expenses that are either business or personal but duly categorized at the tax return stage.

24. Any and all expenses and purchases were properly and duly treated by our bookkeeper/CPA/Accountants Michael Arons and/or Marc Albaum for many years if not decades, with no audits.
25. Any and all expenses and purchases were properly and duly treated either as business or income by our bookkeeper/CPA/Accountants Michael Arons and/or Marc Albaum for many years if not decades, with no audits.
26. Once again AUST Greg Zipes uses hyperbole and lies to describe Debtor hurriedly marking to the best of his memory what purchases were business and what may not have been so that his bookkeeper/CPA/Accountant could hurriedly prepare a Profit & Loss in preparation for his official tax return in July 2023, when it was actually due in October 2023 due to his duly filed extension, but Debtor was pushed, threatened, coerced, harassed, intimidated, and harangued by AUST Greg Zipes and AUSA Dana Walsh Kumar to get them filed faster, in order to meet their "court approved deadline" (clearly they set up a trap to increase the chances of either Debtor or his Bookkeeper/CPA/Accountant making a mistake or clerical error).
27. Later on, Debtor on his own volition, asked his bookkeeper/CPA/Accountant to voluntarily review in-depth, and amend any tax return errors, mistakes which they promptly did.
28. "Debtor" should read "Debtor's attorney Bruce Bronson"
29. "Debtor" should read "Debtor's attorney Bruce Bronson"

30. "Debtor" should read "Debtor's attorney Bruce Bronson"
31. "Debtor" should read "Debtor's attorney Bruce Bronson," but his duly submitted tax returns should suffice.
32. Debtor has provided AUST Zipes years and years of bank statements wherein some months show this monthly business income dollar figure range of approximately \$50,000 to \$150,000.
33. Again, "Debtor" should read "Debtor's attorney Bruce Bronson"
34. "Debtor" should read "Debtor's attorney Bruce Bronson," and we assume that he pays his expert evaluators.

#### **E. The Debtor's Assets and Liabilities**

35. Once again AUST Greg Zipes uses hyperbole and lies to describe Debtor hurriedly marking to the best of his memory what purchases were business and what may not have been so that his bookkeeper/CPA/Accountant could hurriedly prepare a Profit & Loss in preparation for his official tax return in July 2023, when it was actually due in October 2023 due to his duly filed extension, but Debtor was pushed, threatened, coerced, harassed, intimidated, and harangued by AUST Greg Zipes and AUSA Dana Walsh Kumar to get them filed faster, in order to meet their "court approved deadline" (clearly they set up a trap to increase the chances of either Debtor or his Bookkeeper/CPA/Accountant making a mistake or clerical error).

36. Later on, Debtor on his own, asked his bookkeeper/CPA/Accountant to voluntarily review in-depth and amend any errors, mistakes which they promptly did.
37. "Debtor" should read "Debtor's attorney Bruce Bronson"
38. "Debtor" should read "Debtor's attorney Clayton Everett"

#### **F. Discovery**

39. "Debtor" should read "Debtor's attorney Bruce Bronson"
40. Debtor produced whatever he could produce to the fullest and best of his ability, even traveling to various banks to pick certain materials up if they were incomplete or missing in his own books and records, but many would not release these books and records unless Debtor attorney Bruce Bronson consented, which he never did, even after he withdrew, and Debtor emailed and contacted him repeatedly to do so (as well as filed government complaints).
41. Debtor did not comment or change the Document Production Chart because he did not understand it - looked like Chinese to him.
42. Debtor did not "refuse" to answer anything, just could not attest to "quickly waved" electronic signatures by AUST Zipes, or things that he did not recognize.

43. Yes, Debtor and/or family was suffering from severe medical emergency illness for which he provided medical emergency documents/proof.
44. Debtor does not recall signing anything on the SBA Loan Application, as he had financial advisors Jake Rotman from SBG Funding, and Jayanthi Ganapathy from FinAccurate, handle any and all SBA government loans for compliance, in exchange for a large fee.
45. As stated above, the SBA loan was approved and received many years before Joe Biden's economy and inflation forced Debtor, his family and baby, to relocate (flee) from Manhattan to New Rochelle NY due a new inability to afford working/living in Manhattan anymore.
46. Debtor used the funds for exactly the proper business purposes, including but not limited to hiring and paying 10-20 employees for many years from SBA funds, as well as office rent, business insurance, office supplies, business advertising, business marketing, occasional employee bonuses and gifts and weekly lunches for his hardworking staff, etc.
47. In contrast to AUST Zipes' lies, Debtor has fully accounted for the proceeds of the SBA Loan within his tax returns and detailed financial statements.
48. Due to the fluidity and nature of liquid money, it is hard to tell when the loan ends and Debtor's law firm business income begins, due to mixing within the Operating Account, and routine monthly gross incomes of \$50,000-\$150,000 for many years

AFTER SBA loan approval and disbursement in 2020, according to Debtor's financial advisory Jayanthi Ganapathy of FinAccurate company, as well as Debtor's bookkeepers/CPAs/Accountants, and lawyers.

49. All SBA Funds were used for business related purposes to the fullest extent possible per his tax returns and in accordance with law and ethics.
50. A small business home law office was located on or about July 6, 2022, by Debtor and his fully salaried, employee-tax paying, Law Office Manager, a full 2 years after SBA loan application, approval, and disbursement, due to Debtor's inability to financially survive/work in Manhattan with a small family and baby, pending eviction proceedings in Manhattan, poor credit thus making remaining in New York City impossible, Joe Biden's inflation, NYC Mayor Bill DeBlasio's and New York City District Attorney Alvin Bragg's escalating crime rate, as well as massive COVID financial losses.
51. The New Rochelle Property was purchased on Debtor's Schedule C tax return for the law firm Manchanda Law per his bookkeepers/CPA/Accountants and lawyers.
52. "Debtor" herein should read "Debtor's bankruptcy lawyer Bruce Bronson and/or bookkeeper/CPA/accountant Michael Arons or Marc Albaum" claimed a homestead exemption (which Debtor still doesn't know what that is) and for which Debtor filed complaints against them all, when first advised by AUSA Dana Walsh Kumar during the depositions.

53. Again, Debtor is unaware of any zoning prohibitions on said property, and many small businesses operate in Debtor's neighborhood including Debtor's 5 year old son's school teacher/Montessori owner who lives a few blocks away, plus has an office in a nearby church, plus the Ward Public School where Debtor's son goes now, only a few blocks away as well.

#### **G. The Adversary Proceeding**

54. Debtor hired and paid various highly skilled and expensive professionals large sums of money, in order to competently prepare and file complex financial packages, such as bankruptcy petitions, schedules, and schedule C tax returns, and should be allowed to rely on their work, as such.
55. Debtor can not be expected to "explain aspects" of these complex filings.
56. Debtor to this day has no reason to believe that Bruce Bronson and his expert valuations were inaccurate or incorrect, so he did not change them.
57. Debtor to this day has no reason to believe that Bruce Bronson and his expert valuations were inaccurate or incorrect, so he did not change them.
58. If glaring errors were brought to his attention by AUST Zipes or AUSA Kumar, Debtor promptly filed complaints with government agencies, law enforcement, or disciplinary committees, while also asking those preparers to correct their work if necessary.

59. Debtor has not received any recent bankruptcy order appeal information, even though he paid a lot of money in filing fees, and has filed multiple complaints thereon (see attached).
60. Institutional corruption and incompetence is a hard nut to crack, and goes up very high in this state and city, but Debtor is up for the challenge.

#### **H. The Debtor's Prior Bankruptcy Filings**

61. We have already explained to AUST Zipes that the vast majority of previous erroneous filings were either mistakes, errors, incomplete, prepared and filed by incompetent lawyers such as Julio Portilla and many others.
62. Debtor should not be penalized for their stupidity.

**Dated:** 11/27/24

Respectfully submitted,

RAHUL DEV MANCHANDA  
*Pro Se Debtor*



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270 Victory Boulevard  
New Rochelle, NY 10804  
Telephone: (646) 645-0993  
Email: rahul.manchanda.new.york@gmail.com

Hello Administrative Office of the US Courts:

I just called and got off the phone with someone named "Maria Lopez" at Bankruptcy Court SDNY in New York City (number below) who, just like the 2 "law clerks" I mentioned below, has no idea what she is doing either.

First, she told me to send another \$298 filing fee for "appeal case no 167," even though I already filed an appeal and notice of election on 9/12/24 which I already paid \$298 for Judge Sean Lane's oral in court decision (he takes weeks to write his "orders," and his last one lifting a stay and denying my multiple motions/pleadings was frankly dangerous and irresponsible).

Second, I filed another appeal and notice of election when I finally received Judge Sean Lane's written order last week, and she called (below) to send her another \$298 instead of consolidating the 2 appeals.

Third, she's telling me they are going to SDNY District Court (who I hate and don't trust) when BOTH my Notices of Appeal and Notices of Election selected the 3 Judge BANKRUPTCY APPELLATE COURT, not the stupid District Court (the other side has to choose the District Court if they want it).

Fourth, the due date for the next steps was 14 days from my first appeal date (first was on 09/12/2024), which I had to teach/remind her, she panicked, sounded shocked and then hung up on me telling me that they would call me back) and that date has passed because these people don't either mail or call me (I'm not on ECF).

Please urgently and immediately help me with these incompetent, untrained imbeciles.

Thanks,

Kind regards,

--

Rahul D. Manchanda, Esq.

125 Park Avenue, 25th Floor

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Mob: (646) 645-0993

Fax: (212) 968-8601

Toll Free 24 Hour Hotline: (855) 207-7660

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On Oct 1, 2024, at 7:57 AM, Rahul Manchanda, Esq. <[rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)> wrote:

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I have now filed and paid the \$298 filing fee for Notice of Appeal and Statement of Election for my case index nos 23-22095, 23-11805, adversary proceedings 23-0080, 24-0090, and 24-0010 and even though lower bankruptcy court law clerks Anna and Ray at 300 Quarropas Street, White Plains NY 10601 have told me repeatedly that the Bankruptcy Appellate Division would contact me, of course, they never have.

Since time is of the essence and I need to know the next steps, and this situation requires federal administrative oversight, please urgently investigate and advise.

Thanks,

Kind regards,

--

Rahul D. Manchanda, Esq.

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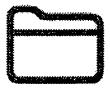
**Reason for call:** Calling from the Bankruptcy Court  
Docket 167 Case 2322095. It is \$298, filing fee for  
appeal. You can mail in a money order.

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Kind regards,

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From: Department of Justice no-reply@usdoj.gov

Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility

Date: Oct 1, 2024 at 2:02:24 PM

To: rdm@manchanda-law.com

---

Submitted on: Tuesday, October 1, 2024 - 2:02PM EDT Submitted to: Anonymous

Submitted values are:

Name of person seeking OPR's action (Complainant)\*: Mr.

First: Rahul

Middle: Dev

Last: Manchanda

Suffix (if applicable): Esq

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: Manchanda Law Office And Associates PLLC

Complainant mailing address: 270 Victory Boulevard

City: New Rochelle

State: New York

Zip: 10804

Complainant email address: [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)

Complainant phone number: 6466450993

Complainant fax number: 2129688601

---

\*If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:\*

Name and title of the filer:

First:

Middle:

Last:

Suffix (if applicable):

Your preferred mailing address:

City:

State:

Zip:

Your email address:

---

**\*Information about the DOJ Attorney or DOJ Law Enforcement Official You Are Complaining About (Subject)\***

Name of the person(s) you are complaining about (Subject): Ms.

First: Maria

Middle:

Last: Lopez

Suffix (if applicable):

Subject's Job Title: DOJ Employee (non-attorney)

Other:

Company/Organization: SDNY Bankruptcy Court

Location of Subject's Office: 1 Bowling Green, New York NY 10004

---

Does your complaint involve more than one person? Yes (If yes, please provide the following information of the additional subject.)

Name of the person(s) of the second subject:

First: Anna

Middle:

Last:

Suffix (if applicable):

Second Subject's Job Title: DOJ Employee (non-attorney)

Other:

Location of second subject's office: 300 Quarropas Street, White Plains NY 10601

---

**\*Information about your complaint\***

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Judicial Proceedings

When did the incident occur?: 2024-10-01

\*Please provide a brief description summarizing the:

- \* reason(s) for your complaint including the details, actions, events, or allegations,
- \* case names,
- \* potential witnesses and their involvement,
- \* where the incident occurred,
- \* how the incident occurred, and
- \* any corrective actions already taken
- \* For \*Whistleblower complaints only\* – describe the personnel action(s) that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

Hello Administrative Office of the US Courts:

I just called and got off the phone with someone named "Maria Lopez" at Bankruptcy Court SDNY in New York City (number below) who, just like the 2 "law clerks" I mentioned below, has no idea what she is doing either.

First, she told me to send another \$298 filing fee for "appeal case no 167," even though I already filed an appeal and notice of election on 9/12/24 which I already paid \$298 for Judge Sean Lane's oral in court decision (he takes weeks to write his "orders," and his last one lifting a stay and denying my multiple motions/pleadings was frankly dangerous and irresponsible).

Second, I filed another appeal and notice of election when I finally received Judge Sean Lane's written order last week, and she called (below) to send her another \$298 instead of consolidating the 2 appeals.

Third, she's telling me they are going to SDNY District Court (who I hate and don't trust) when BOTH my Notices of Appeal and Notices of Election selected the 3 Judge BANKRUPTCY APPELLATE COURT, not the stupid District Court (the other side has to choose the District Court if they want it).

Fourth, the due date for the next steps was 14 days from my first appeal date (first was on 09/12/2024), which I had to teach/remind her, she panicked, sounded shocked and then hung up on me telling me that they would call me back) and that date has passed because these people don't either mail or call me (I'm not on ECF).

Please urgently and immediately help me with these incompetent, untrained imbeciles.

Thanks,  
Kind regards,

--

Rahul D. Manchanda, Esq.

Manchanda Law Office & Associates PLLC  
125 Park Avenue, 25th Floor  
New York, NY 10017

Tel: (212) 968-8600

Mob: (646) 645-0993

Fax: (212) 968-8601

Toll Free 24 Hour Hotline: (855) 207-7660

e-mail: rdm@manchanda-law.com

web: <https://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Immigration Attorneys in the United States by Newsweek Magazine in 2012 and Top Attorneys Nationwide in 2013.

Martindale Hubbell Client Champion 2017 Silver Award Winner, 2020 Gold Award Winner, 2020 Platinum Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <https://manchanda-law.com/testimonials/>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service. Attention: All foreign nationals (permanent

residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <https://www.uscis.gov/ar-11>. Please also notify our office of your new address.

Make An Online Legal Fee Payment via [https://pay.paysley.com/pos\\_link/deFpBu7Sv5oqk1gZhB9cQi59Yj](https://pay.paysley.com/pos_link/deFpBu7Sv5oqk1gZhB9cQi59Yj), wire transfer, check, cash, ApplePay (6466450993)

On Oct 1, 2024, at 7:57 AM, Rahul Manchanda, Esq. <[rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)> wrote:

Hello Administrative Office of the US Courts:

I have now filed and paid the \$298 filing fee for Notice of Appeal and Statement of Election for my case index nos 23-22095, 23-11805, adversary proceedings 23-0080, 24-0090, and 24-0010 and even though lower bankruptcy court law clerks Anna and Ray at 300 Quarropas Street, White Plains NY 10601 have told me repeatedly that the Bankruptcy Appellate Division would contact me, of course, they never have.

Since time is of the essence and I need to know the next steps, and this situation requires federal administrative oversight, please urgently investigate and advise.

Thanks,  
Kind regards,

--  
Rahul D. Manchanda, Esq.

**Manchanda Law Office & Associates PLLC**  
**125 Park Avenue, 25th Floor**  
**New York, NY 10017**  
**Tel: (212) 968-8600**  
**Mob: (646) 645-0993**  
**Fax: (212) 968-8601**  
**Toll Free 24 Hour Hotline: (855) 207-7660**  
**e-mail: rdm@manchanda-law.com**  
**web: <https://manchanda-law.com/attorney-profiles/>**

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**Best Family Lawyers and Best Immigration Lawyers in New York City in 2022 as published on Expertise.com**

**U.S. News and World Report Listed Lawyer.**

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Make An Online Legal Fee Payment via [https://pay.paysley.com/pos\\_link/deFpBu7Sv5oqk1gZhB9cQi59Yj](https://pay.paysley.com/pos_link/deFpBu7Sv5oqk1gZhB9cQi59Yj), wire transfer, check, cash, ApplePay (6466450993)

Certification and Signature (Enter your initials here to certify and sign this form.):  
RDM

From: Rahul Manchanda, Esq. rdm@manchanda-law.com  
Subject: Fwd: Form submission from: How to File a Complaint with the Office of Professional Responsibility  
Date: Oct 2, 2024 at 11:18:04 AM  
To: Administrative Office Of Judicial Integrity AO\_OJI@ao.uscourts.gov, Administration Oversight Of The US Courts Judicial Oversight JCD\_PetitionforReview@ao.uscourts.gov, Administrative Office Of The US Courts AdminOversight@ao.uscourts.gov, ustrustee.program@usdoj.gov, USTP.Region02@usdoj.gov, Law Office Manager Sylwia Manchanda sylwia.manchanda@manchanda-law.com, FBI IC ny1@ic.fbi.gov, newyork@fbi.gov, Criminal.Division@usdoj.gov, Civil.Feedback@usdoj.gov  
Bcc: Rahul Manchanda Esq. rdm@manchanda-law.com

---

FYI please assist.

Kind regards,

--

Rahul D. Manchanda, Esq.

Manchanda Law Office & Associates PLLC  
125 Park Avenue, 25th Floor  
New York, NY 10017  
Tel: (212) 968-8600  
Mob: (646) 645-0993  
Fax: (212) 968-8601  
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e-mail: rdm@manchanda-law.com  
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(6466450993)

Begin forwarded message:

**From:** Department of Justice <no-reply@usdoj.gov>  
**Date:** October 1, 2024 at 2:02:24 PM EDT  
**To:** rdm@manchanda-law.com  
**Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility**  
**Reply-To:** Department of Justice <no-reply@usdoj.gov>

Submitted on: Tuesday, October 1, 2024 - 2:02PM EDT Submitted to: Anonymous  
Submitted values are:

Name of person seeking OPR's action (Complainant)\*: Mr.

First: Rahul

Middle: Dev

Last: Manchanda

Suffix (if applicable): Esq

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: Manchanda Law Office And Associates PLLC

Complainant mailing address: 270 Victory Boulevard

City: New Rochelle

From: Department of Justice no-reply@usdoj.gov  
Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility  
Date: Nov 1, 2024 at 1:48:23 PM  
To: rdm@manchanda-law.com

---

Submitted on: Friday, November 1, 2024 - 1:48PM EDT Submitted to: Anonymous  
Submitted values are:

Name of person seeking OPR's action (Complainant)\*: Mr.

First: Rahul

Middle: Dev

Last: Manchanda

Suffix (if applicable): Esq

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: Manchanda Law Office And Associates PLLC

Complainant mailing address: 125 Park Avenue, 25th Floor

City: New York

State: New York

Zip: 10017

Complainant email address: [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)

Complainant phone number: 2129688600

Complainant fax number: 2129688601

---

\*If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:\*

Name and title of the filer:

First:

Middle:

Last:

Suffix (if applicable):

Your preferred mailing address:

City:

State:

Zip:

Your email address:

---

**\*Information about the DOJ Attorney or DOJ Law Enforcement Official You Are Complaining About (Subject)\***

Name of the person(s) you are complaining about (Subject): Ms.

First: Maria

Middle:

Last: Lopez

Suffix (if applicable):

Subject's Job Title: DOJ Employee (non-attorney)

Other:

Company/Organization: SDNY Bankruptcy Appeals Court

Location of Subject's Office: 1 Bowling Green, New York NY 10004

---

Does your complaint involve more than one person? No

Name of the person(s) of the second subject:

First:

Middle:

Last:

Suffix (if applicable):

Second Subject's Job Title:

Other:

Location of second subject's office:

---

**\*Information about your complaint\***

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Judicial Proceedings

When did the incident occur?: 2024-10-16

\*Please provide a brief description summarizing the:

- \* reason(s) for your complaint including the details, actions, events, or allegations,
- \* case names,
- \* potential witnesses and their involvement,
- \* where the incident occurred,
- \* how the incident occurred, and
- \* any corrective actions already taken
- \* For \*Whistleblower complaints only\* – describe the personnel action(s) that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

I have called this woman Maria Lopez a 100 times inquiring about the status of my fully paid for bankruptcy court order appeals and she refuses to either call or email me back with case status information. She is literally sabotaging my appeals for case nos 23-22095 and 23-11805, adversary proceedings 23-07008, 24-07009, and 24-0010 in this manner, and she knows that I'm not on ECF notification because Judge Sean Lane demands I physically file with "wet signatures" my pleadings, and US Court of Appeals 2nd Circuit Chief Law Clerk Catherine O'Hagan Wolfe has

unconstitutionally, arbitrarily, capriciously removed both my ECF and filing ability in both SDNY and US Court of Appeals 2nd Circuit. Please urgently assist.

**Certification and Signature (Enter your initials here to certify and sign this form.):**

RDM

,From: Rahul Manchanda, Esq. rdm@manchanda-law.com

Subject: Fwd: Form submission from: How to File a Complaint with the Office of Professional Responsibility

Date: Nov 1, 2024 at 2:05:20 PM

To: Administrative Office Of Judicial Integrity AO\_OJI@ao.uscourts.gov, Administration Oversight Of The US Courts Judicial Oversight JCD\_PetitionforReview@ao.uscourts.gov, Administrative Office Of The US Courts AdminOversight@ao.uscourts.gov

---

US Administrator of the Courts:

FYI please investigate and advise.

Kind regards,

--

Rahul D. Manchanda, Esq.

Manchanda Law Office & Associates PLLC  
125 Park Avenue, 25th Floor  
New York, NY 10017  
Tel: (212) 968-8600  
Mob: (646) 645-0993  
Fax: (212) 968-8601  
Toll Free 24 Hour Hotline: (855) 207-7660  
e-mail: rdm@manchanda-law.com  
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Make An Online Legal Fee Payment via [https://pay.paysley.com/pos\\_link/deFpBu7Sv5oqk1gZhB9cQi59Yj](https://pay.paysley.com/pos_link/deFpBu7Sv5oqk1gZhB9cQi59Yj), wire transfer, check, cash, ApplePay (6466450993)

Begin forwarded message:

**From:** Department of Justice <no-reply@usdoj.gov>

**Date:** November 1, 2024 at 1:48:23 PM EDT

**To:** rdm@manchanda-law.com

**Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility**

**Reply-To:** Department of Justice <no-reply@usdoj.gov>

Submitted on: Friday, November 1, 2024 - 1:48PM EDT Submitted to: Anonymous  
Submitted values are:

Name of person seeking OPR's action (Complainant)\*: Mr.

First: Rahul

Middle: Dev

Last: Manchanda

Suffix (if applicable): Esq

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: Manchanda Law Office And Associates PLLC

Complainant mailing address: 125 Park Avenue, 25th Floor

City: New York

State: New York

Zip: 10017

Complainant email address: [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)

Complainant phone number: 2129688600

Complainant fax number: 2129688601

---

\*If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:\*

From: DoNotReply DoNotReply@uspsoig.gov  
Subject: Hotline Complaint  
Date: Nov 20, 2024 at 12:27:23PM  
To: rdm rdm@manchanda-law.com

---

### **Office of Consumer Affairs: NEW YORK 3**

Thank you for contacting the U.S. Postal Service Office of Inspector General (OIG). By conducting audits, evaluations, and investigations, the OIG ensures efficiency, accountability, and integrity in the U.S. Postal Service.

We carefully review every submission to ensure it is a matter under the OIG's jurisdiction or area of responsibility. After reviewing the information submitted, we have determined the U.S. Postal Service Consumer and Industry Contact Office is the correct contact.

The OIG has forwarded your correspondence to the office below for their review and action. Please direct all further inquiries on this matter to:

United States Postal Service  
Consumer & Industry Contact Office  
30 Old Karner Rd Albany, NY 12288-9631

(518) 452-2218 or (800) ASK-USPS

Sincerely,  
The OIG Hotline Team

From: No Reply noreply@uspsoig.gov  
Subject: USPS OIG Hotline Complaint (Complaint# 50103)  
Date: Nov 20, 2024 at 9:08:28 AM  
To: rdm@manchanda-law.com

---

## USPS OIG Hotline Complaint Confirmation

Complaint  
Number: 50103

---

Reference  
Number: 13507

---

Zip Code  
where the  
problem or  
concern  
occurred: 10804

---

I am a: Postal Customer

---

Need help  
with: Report a postal crime or fraud, waste, and abuse within the  
Postal Service (This option will provide a list of concerns to  
choose from that fall under the OIG's jurisdiction.)

---

Postal  
service  
concern: Theft or destruction of, or tampering with the mail

---

This was  
something: Something I was to receive in the mail but

---

Mail  
contents: I don't know

---

Details of  
item(s): Any and all mail from Bankruptcy Court located at 300  
Quarropas Street, White Plains NY 10601 and/or SDNY 500  
Pearl Street, New York NY 10007 or US Court of Appeals 2nd  
Circuit located at 40 Foley Square, New York NY 10007

---

Method of mailing: **First-Class Mail**

---

Tracking Number:

---

Experienced mail missing before: **Yes**

---

Enrolled in USPS Informed Delivery: **Yes**

---

If Yes, image of item appear on notification: **No**

---

Sender Address 1: **Bankruptcy Court located at 300 Quarropas Street, White Plains NY 10601**

---

Sender Address 2: **SDNY 500 Pearl Street, New York NY 10007**

---

Sender City:

---

Sender State:

---

Recipient Address 1:

---

Recipient Address 2:

---

Recipient

Zip Code:

Recipient  
City:

Recipient  
State:

Sender Zip  
Code:

Do you have  
first-hand  
knowledge  
of the matter  
you are  
reporting?

Yes

Date of  
Occurrence:

What  
Happened:

We have reported to you countless times before the suspicious and mysterious non-receipt of mail stemming from my bankruptcy proceedings from AUST Gregory Zipes located at 1 Bowliing Green, New York NY 10004 and AUSA Dana Walsh Kumar located at 86 Chambers Street, New York NY 10007 and the other court addresses provided above, we think in order to derail, sabotage, disrupt, disorient, and prevent due process in my court proceedings so that I can not or do not respond to their pleadings, motions and letters, helping them to make me lose my case(s) unfairly, illegally, and unethically. We think the USPS may be involved in this conspiracy, possibly Freemasons. Please investigate and advise.

My  
complaint is Unknown  
about a:

Do you  
know who  
committed  
the crime or  
misconduct?

No

First Name:

Last Name:

Other Info:

Anyone else  
involved?

No

Please list  
the name(s)  
of the other  
people and  
how you  
believe they  
were  
involved:

Privacy  
Choice:

Confidential - Can Release Info

First Name: Rahul

Last Name: Manchanda

Address 1: 270 Victory Boulevard

Address 2:

Zip Code: 10804

City: New Rochelle

**State:** NY

---

**Phone:** 6466450993

---

**Email:** rdm@manchanda-law.com

---

From: Rahul Manchanda, Esq. [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)  
Subject: Fwd: Fwd: Form submission from: How to File a Complaint with the  
Office of Professional Responsibility

Date: Oct 21, 2024 at 8:13:08 PM

To: [ao\\_ogi@ao.uscourts.gov](mailto:ao_ogi@ao.uscourts.gov), [adminoversight@ao.uscourts.gov](mailto:adminoversight@ao.uscourts.gov),  
[JCD\\_PetitionforReview@ao.uscourts.gov](mailto:JCD_PetitionforReview@ao.uscourts.gov)  
Cc: [12022260577@efaxsend.com](mailto:12022260577@efaxsend.com), [12022253414@efaxsend.com](mailto:12022253414@efaxsend.com),  
[ccpr@ohchr.org](mailto:ccpr@ohchr.org), [ohchr-ccpr@un.org](mailto:ohchr-ccpr@un.org), [ohchr-petitions@un.org](mailto:ohchr-petitions@un.org),  
[petitions@ohchr.org](mailto:petitions@ohchr.org), [TB-petitions@ohchr.org](mailto:TB-petitions@ohchr.org),  
[12022280566@efaxsend.com](mailto:12022280566@efaxsend.com), [caserwork@cruz.senate.gov](mailto:caserwork@cruz.senate.gov),  
[west\\_texas@cruz.senate.gov](mailto:west_texas@cruz.senate.gov), [central\\_texas@cruz.senate.gov](mailto:central_texas@cruz.senate.gov),  
[east\\_texas@cruz.senate.gov](mailto:east_texas@cruz.senate.gov), [north\\_texas@cruz.senate.gov](mailto:north_texas@cruz.senate.gov),  
[southeast\\_texas@cruz.senate.gov](mailto:southeast_texas@cruz.senate.gov), [south\\_texas@cruz.senate.gov](mailto:south_texas@cruz.senate.gov),  
[12022280526@efaxsend.com](mailto:12022280526@efaxsend.com), [12022245220@efaxsend.com](mailto:12022245220@efaxsend.com),  
[matt.gaetz@myfloridahouse.gov](mailto:matt.gaetz@myfloridahouse.gov), [matt@mattgaetz.com](mailto:matt@mattgaetz.com),  
[15733345947@efaxsend.com](mailto:15733345947@efaxsend.com), [senator@paul.senate.gov](mailto:senator@paul.senate.gov),  
[rand\\_paul@paul.senate.gov](mailto:rand_paul@paul.senate.gov), U.S. Senator Rand Paul  
[senator@paul.senate.gov](mailto:senator@paul.senate.gov), [press\\_paul@paul.senate.gov](mailto:press_paul@paul.senate.gov),  
[paul\\_schedule@paul.senate.gov](mailto:paul_schedule@paul.senate.gov), [rand\\_paul@paul.senate.gov](mailto:rand_paul@paul.senate.gov), Paul  
Roberts [pcr3@icloud.com](mailto:pcr3@icloud.com), [dmcadams@ronpaulinstitute.org](mailto:dmcadams@ronpaulinstitute.org),  
[12022246020@efaxsend.com](mailto:12022246020@efaxsend.com), [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov),  
[crcl@dhs.gov](mailto:crcl@dhs.gov), [01141229179011@efaxsend.com](mailto:01141229179011@efaxsend.com), [FBI IC ny1@ic.fbi.gov](mailto:FBI IC ny1@ic.fbi.gov),  
[newyork@fbi.gov](mailto:newyork@fbi.gov), [Civil.Feedback@usdoj.gov](mailto:Civil.Feedback@usdoj.gov), [civilrights@cair.com](mailto:civilrights@cair.com),  
[info@cair.com](mailto:info@cair.com), [Criminal.Division@usdoj.gov](mailto:Criminal.Division@usdoj.gov),  
[media@ronpaulinstitute.org](mailto:media@ronpaulinstitute.org), [media@usinpac.com](mailto:media@usinpac.com),  
[webcontact@mintpressnews.com](mailto:webcontact@mintpressnews.com), [tips@zerohedge.com](mailto:tips@zerohedge.com),  
[srickard@gmail.com](mailto:srickard@gmail.com), Lars Thomas [larsth43@yahoo.com](mailto:larsth43@yahoo.com),  
[pmgiraldi@gmail.com](mailto:pmgiraldi@gmail.com), [doug@blacklistednews.com](mailto:doug@blacklistednews.com),  
[TIPS@blacklistednews.com](mailto:TIPS@blacklistednews.com), [info@trunews.com](mailto:info@trunews.com)

---

Administrative Office of the U.S. Courts:

FYI 2

cc: House and Senate Judiciary Committee

**From:** Department of Justice <[no-reply@usdoj.gov](mailto:no-reply@usdoj.gov)>  
**Date:** October 19, 2024 at 7:15:00 PM EDT  
**To:** [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)

**Subject: Form submission from: How to File a Complaint with the Office of Professional Responsibility**

**Reply-To:** Department of Justice <[no-reply@usdoj.gov](mailto:no-reply@usdoj.gov)>

Submitted on: Saturday, October 19, 2024 - 7:14PM EDT Submitted to: Anonymous  
Submitted values are:

Name of person seeking OPR's action (Complainant)\*: Mr.

First: Rahul

Middle: Dev

Last: Manchanda

Suffix (if applicable): Esq

Complainant Type: Private Attorney

Inmate/Detainee Number:

Other:

Company/Organization: Manchanda Law Office And Associates PLLC

Complainant mailing address: 125 Park Avenue, 25th Floor

City: New York

State: New York

Zip: 10017

Complainant email address: [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)

Complainant phone number: 6466450993

Complainant fax number: 2129688601

---

\*If you are filing this complaint as a legal or other representative of the Complainant, please provide the following information:\*

Name and title of the filer:

First:

Middle:

Last:

Suffix (if applicable):

Your preferred mailing address:

City:

State:

Zip:

Your email address:

---

\*Information about the DOJ Attorney or DOJ Law Enforcement Official You Are  
Complaining About (Subject)\*

Name of the person(s) you are complaining about (Subject): Ms.

First: Dana

Middle: Walsh

Last: Kumar

Suffix (if applicable): Esq

Subject's Job Title: Assistant United States Attorney (AUSA)

Other:

Company/Organization: US Attorneys Office SDNY

Location of Subject's Office: 86 Chambers Street, 3rd Floor, New York NY 10004

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Does your complaint involve more than one person? Yes (If yes, please provide the following information of the additional subject.)

Name of the person(s) of the second subject:

First: Sean

Middle:

Last: Lane

Suffix (if applicable): Esq

Second Subject's Job Title: DOJ Employee (non-attorney)

Other:

Location of second subject's office: 300 Quarropas Street, White Plains NY 10601

---

**\*Information about your complaint\***

What are the actions, events, or allegations that you are reporting to OPR? (e.g., attorney misconduct, Whistleblower retaliation, Giglio/Brady violation, etc.): Judicial Proceedings

When did the incident occur?: 2024-10-17

**\*Please provide a brief description summarizing the:**

- \* reason(s) for your complaint including the details, actions, events, or allegations,
- \* case names,
- \* potential witnesses and their involvement,
- \* where the incident occurred,
- \* how the incident occurred, and
- \* any corrective actions already taken
- \* For \*Whistleblower complaints only\* – describe the personnel action(s) that occurred or failed to occur because of a protected disclosure: (an appointment, a promotion, an action under 5 U.S.C. Chapter 75 or other disciplinary or corrective action; a detail, transfer, or reassignment; a reinstatement; a restoration; a

reemployment; a decision about pay, benefits or awards, concerning education or training if the education or training may reasonably be expected to lead to an appointment, promotion, performance evaluation or other action described in 5 U.S.C. § 2302 (a)(2); a performance evaluation under 5 U.S.C. Chapter 43; a decision to order psychiatric testing or examination; or any other significant change in duties, responsibilities, or working conditions.)

Please provide a brief summary of the complaint:

AUSA Dana Walsh Kumar, in collusion with SDNY Bankruptcy Judge Sean Lane, is purposefully delaying serving me with time sensitive documents and judicial orders in order that I receive them past the statutory 14 days to appeal them to the

Bankruptcy Appellate Division, such as recently with Judge Sean Lane's illegal October 2, 2024 judicial order "authorizing a subpoena" which is in violation of Internal Revenue Code section 7216 et seq preventing unauthorized release of tax return information from a CPA/Accountant/Tax Preparer once the taxpayer invokes said protection, which AUSA Dana Walsh Kumar emailed to me on October 17, 2024, fully 15 days later (on purpose). Even worse, AUSA Dana Walsh Kumar knows that I am NOT on ECF for this case, depend exclusively on US Mail and/or Email for service/notice from both her office, as well as court or judicial orders, which Sean Lane also knows and apparently did not mail or email to me either (I have filed a USPS OIG Complaint about lost/stole n mail) and I am waiting for the results of their investigation. These people do this to me routinely as well as ignore when other

participants or my attackers in this court bankruptcy cases 23-22095 and 23-11805 do to me all the time and I complain but the Judge ignores, such as David Lin of Lewis & Lin LLC a lawyer for a frivolous adversary proceeding brought by malicious prosecution abuse of process private plaintiff Douglas Senderoff. Please urgently investigate and advise.

Certification and Signature (Enter your initials here to certify and sign this form.):

RDM

From: No Reply noreply@uspsoig.gov  
Subject: USPS OIG Hotline Complaint (Complaint# 43767)  
Date: Oct 19, 2024 at 1:55:48 PM  
To: rdm@manchanda-law.com

---

## USPS OIG Hotline Complaint Confirmation

Complaint Number: 43767

---

Reference Number: 5511

---

Zip Code where the problem or concern occurred: 10804

---

I am a: Postal Customer

---

Need help with: Report a postal crime or fraud, waste, and abuse within the Postal Service (This option will provide a list of concerns to choose from that fall under the OIG's jurisdiction.)

---

Postal service concern: Theft or destruction of, or tampering with the mail

---

This was something: Something I was to receive in the mail but

---

Mail contents: Merchandise

---

Details of item(s): SDNY Judge Sean Lane Court Order

---

Method of mailing: First-Class Mail

---

Tracking

**Number:**

Experienced  
mail missing      Yes  
before:

Enrolled in  
USPS      Yes  
Informed  
Delivery:

If Yes, image  
of item appear      No  
on notification:

**Sender**  
Address 1:      300 Quarropas Street

**Sender**  
Address 2:

Sender City:      White Plains

Sender State:      NY

**Recipient**  
Address 1:      270 Victory Boulevard

**Recipient**  
Address 2:

Recipient Zip  
Code:      10804

Recipient City:      Wykagyl

Recipient  
State:      NY

Sender Zip 10601  
Code:

---

Do you have  
first-hand  
knowledge of the matter you  
are reporting? Yes

---

Date of Occurrence: 10/19/2024

---

What Happened: Once again the stupid son of a bitch who delivers our mail leaves the mailbox lip open after he delivers our mail so that any random walker, driver or thief can steal our mail right out of the box, or wind can take it away. How many goddamned times do we have to complain about this before it gets fixed?!?

---

My complaint is about a: USPS Employee/Contractor

---

Do you know who committed the crime or misconduct? Yes

---

First Name:

---

Last Name:

---

Other Info:

---

Anyone else involved? No

---

Please list the

name(s) of the  
other people  
and how you  
believe they  
were involved:

---

Privacy  
Choice: **No Restriction**

---

First Name: **Rahul**

---

Last Name: **Manchanda**

---

Address 1: **270 Victory Boulevard**

---

Address 2:

---

Zip Code: **10804**

---

City: **Wykagyl**

---

State: **NY**

---

Phone: **6466450993**

---

Email: **rdm@manchanda-law.com**

---

From: OIG noreply@uspsoig.gov  
Subject: Hotline Complaint  
Date: Sep 20, 2024 at 7:23:08 AM  
To: rdm@manchanda-law.com

---

After careful review, we have determined the U.S. Postal Service Consumer and Industry Contact Office is the proper office to handle your concern. We have forwarded this inquiry to your local consumer affairs office for direct response to you.

Please direct all further inquiries to the office noted below. We have no further information to provide now that your concern has been forwarded.

For further information, please contact:

USPS Consumer and Industry Contact Office  
30 Old Karner Rd Albany, NY 12288-9631  
(518) 452-2218 or (800) ASK-USPS (800-275-8777)

Thank you for contacting the Postal Service Office of Inspector General Hotline.

Sincerely,

The OIG Hotline Team **Submitted On** Thursday, September 19, 2024 17:54

**Submission ID:** 594437

**I am a....:** USPS Customer

**Do you wish to remain anonymous?:** No

**Do you want confidentiality?:** No

**Are you willing to be interviewed?:** Yes

**Full Name:** Rahul Manchanda

**Street Address:** 270 Victory Boulevard

**City:** New Rochelle

**State:** NY

**Zip Code:** 10804

**Primary Phone Number:** 6466450993

**Secondary Phone Number:** 2129688600

**E-mail Address:** rdm@manchanda-law.com

**When did the misconduct occur?:** 2024-09-19

**Who committed the alleged misconduct/wrongdoing?**

Our mailman

**What are the facts?**

Why does our mailman leave our mailbox open everyday so other neighbors (or himself) can steal our mail?

**Where did the misconduct/wrongdoing occur?**

270 Victory Boulevard, New Rochelle NY 10804

**How was the misconduct/wrongdoing committed?**

Our mailman constantly leaves our mailbox open so either he or others can steal our mail

**Do you have first-hand knowledge of the misconduct/wrongdoing?**

Yes

**Where can we obtain additional information concerning the misconduct/wrongdoing?**

Our Ring.com videos and multiple eye witnesses

**Who else might be aware of the misconduct/wrongdoing?**

The entire neighborhood

WILLIAM K. HARRINGTON  
United States Trustee for Region 2  
U.S. Department of Justice  
Office of the United States Trustee  
One Bowling Green, Room 534  
New York, New York 10004  
Tel. (212) 510-0500  
By: Greg M. Zipes, Esq.  
Trial Attorney

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----  
In re

Chapter 7

RAHUL DEV MANCHANDA,

Case No. 23-22095 (SHL)

Debtor.

-----  
WILLIAM K. HARRINGTON,  
as United States Trustee for Region 2,

Adv. Case No. 24 -07009

Plaintiff,

-against-

RAHUL DEV MANCHANDA,

Defendant.

-----  
X

**PLAINTIFF'S STATEMENT OF MATERIAL UNDISPUTED FACTS PURSUANT TO  
LOCAL BANKRUPTCY RULE 7056-1 IN CONNECTION WITH THE UNITED  
STATES TRUSTEE'S COMPLAINT OBJECTING TO DEBTOR'S DISCHARGE  
PURSUANT TO 11 U.S.C. §§ 11 U.S.C. 727(a)(3), 727(a)(4)(A) AND 727(a)(5)**

William K. Harrington, the United States Trustee for Region 2 (the "United States Trustee," or the "Plaintiff"), by and through the undersigned attorney, submits the following Statement of Undisputed Facts in connection with the above referenced case (the "Bankruptcy Case") and adversary proceeding (the "Adversary Proceeding"):

**A. The Bankruptcy Filing With the Initial Petition, Schedules, and Statement of Financial Affairs**

1. On February 4, 2023 (the "Filing Date"), the Debtor commenced the Bankruptcy

Case by filing a voluntary petition (the "Petition").

2. On the Filing Date, the Debtor also filed certain schedules of assets and liabilities (the "Initial Schedules").

3. On March 8, 2023, the Debtor filed an amended version of the Initial Schedules (together, as may be amended, supplemented, or modified, the "Schedules"). *See ECF Doc. Nos. 5, 13.*

4. The Debtor also filed a chapter 7 statement of current monthly income and means test calculation (Form 122A-1) (the "Means Test Form") on February 16, 2023. *See ECF Doc. No. 6.*

5. The Debtor filed a statement of financial affairs, to which an amended version was filed on February 25, 2023 (the "SOFA"). *See ECF Doc. No. 10.*

6. The Debtor has stated under penalties of perjury that his debts are primarily consumer debts, as defined in 11 U.S.C. § 101(8). *See Zipes Decl. Ex. B (Petition).*

7. More generally, the Debtor has signed his Petition, Schedules, SOFA, and Means Test Form pleadings in this case under penalties of perjury.

**B. The Debtor's Home and Business Locations**

8. The Debtor lives at 270 Victory Boulevard, New Rochelle, New York 10801 (the "New Rochelle Property").

9. The New Rochelle Property is a residential house.

There is no zoning prohibition that the New Rochelle Property can not also be used as a small business home law office as well.

"Debtor" should read "Debtor's attorney Bruce Bronson"

"Debtor" should read "Debtor's attorney Bruce Bronson" as Debtor doesn't know what a "consumer debt" is.

"Debtor" should read "Debtor's attorney Bruce Bronson"

Debtor assumes his attorney Bruce Bronson knew what he was doing, Debtor can not verify electronic signatures, only wet ones

Yes, Debtor and his family also live at the location of his small business home law office, as well.

10. The following is an excerpt from the Debtor's Petition, whereby the Debtor states under penalty of perjury that he lives at the New Rochelle Property:

5. Where you live

270 Victory Blvd  
New Rochelle, NY 10801  
Number, Street, City, State & ZIP Code

Westchester  
County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

Number, P.O. Box, Street, City, State & ZIP Code

See Zipes Decl. Ex. B (Petition).

11. Under penalty of perjury, the Debtor does not claim any lease associated with the New Rochelle Property, whether with his law practice or otherwise.

12. The following is an excerpt from the Debtor's Petition, Schedule G, whereby the Debtor, under penalty of perjury, states that he has no lease in connection with the New Rochelle Property:

**Official Form 106G**  
**Schedule G: Executory Contracts and Unexpired Leases**

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the additional page, fill it out, number the entries, and attach it to this page. On the top of any additional pages, write your name and case number (if known).

- Do you have any executory contracts or unexpired leases?
  No. Check this box and file this form with your other schedules. You have nothing else to report on this form.
  Yes. Fill in all of the information below even if the contacts of lessees are listed on Schedule A/B: Property (Official Form 106 A/B).
- List separately each person or company with whom you have the contract or lease. Then state what each contract or lease is for (for example, rent, vehicle lease, cell phone). See the instructions for this form in the instruction booklet for more examples of executory contracts and unexpired leases.

Person or company with whom you have the contract or lease  
Name, Number, Street, City, State and ZIP Code

State what the contract or lease is for

2.1 Yourwallstreetoffice.com  
30 Wall St Fl B  
New York, NY 10005-2205

Lessee of office space; month to month \$6,000 per  
month; Business expense but personally liable

See Zipes Decl. Ex. B (Schedule G).

13. The Debtor, under penalty of perjury, does not claim any business is located at the New Rochelle Property in his Schedules or SOFA.

Monthly payments for Debtor home law office locations were changed from lease to mortgage payments when Debtor and his family moved from Manhattan to New Rochelle NY, 2 years after being approved for the SBA loan.

"Debtor" should read "Debtor's attorney Bruce Bronson"

14. In an email dated October 24, 2024 sent to parties in this case, the Debtor listed his business address as the following:

Rahul D. Manchanda, Esq.  
Manchanda Law Office & Associates PLLC  
125 Park Avenue, 25th Floor  
New York, NY 10017

15. In an email dated August 16, 2024, sent to parties in this case, the Debtor listed the following as his business addresses:

Manhattan NYC Office  
125 Park Avenue, 25th Floor  
New York, NY 10017

Westchester NY Office  
173 Huguenot Street, Suite 200  
New Rochelle, NY 10801

Debtor no longer maintains the virtual office nor paid for the 173 Huguenot Street New Rochelle NY office because of disputes with Regus their parent company, so only had for a few days/weeks.

### C. The Debtor's Representation by Mr. Bronson in this Case

16. The Debtor was initially represented in the Bankruptcy Case by H.B. Bronson (“Mr. Bronson”) of Bronson Law located 480 Mamaroneck Avenue, Harrison, NY 10528. See Zipes Decl. Ex. B (Petition, ECF Doc. No. 1) (listing Mr. Bonson as counsel).

17. Approximately one month after the Filing Date, Mr. Bronson filed an application (the “Withdrawal Application”) to withdraw as counsel to the Debtor, citing the Debtor’s “negative comments” and alleging that the Debtor “questioned [the] Firm’s integrity and morality.” See Zipes Decl. Ex. C (Withdrawal Application at ¶ 3 and 6).

18. The Court granted the Withdrawal Application, and he was thus discharged of his responsibilities as the Debtor’s counsel by order signed April 20, 2023. See Zipes Decl. Ex. D (Order).

and Judge Sean Lane allowed this - we are not certain of the date of official termination of legal services. According to AUST Greg Zipes Bruce Bronson was our official bankruptcy lawyer until April 20, 2023 as stated above, more than 2 months after his filing, not 1 month as AUST Greg Zipes lies above.

Debtor started a “virtual office location” there around August 2024 after 30 Wall Street and Trustee Salvatore Lamonica forced him out due to non-payment due to bankruptcy

No Bruce Bronson in a drunken alcoholic rage tried to get me to pay him \$5000 per motion for the duration of the case, we could not afford this, so he withdrew

#### D. The Debtor's Income and Expenses

19. Per the Debtor's Schedules, filed under penalty of perjury, the Debtor is a duly licensed attorney currently employed by Manchanda Law Office PLLC. *See Zipes Decl. Ex. E* (Amended Schedule I, ECF Doc. No. 5).

20. The Debtor owns 100 percent of Manchanda Law Office PLLC (the "Manchanda Law Firm"). *See Schedule A/B*, ECF Doc. No. 13.

No, Law Office Managers have exclusively handled the law firm finances after Debtor had a heart attack in August 2019.

21. The Debtor is generally familiar with the finances of the Manchanda Law Firm.

22. In an email dated June 14, 2023, the Debtor wrote to another attorney in this case: "[a]s a lawyer you are mandated to keep client files for 7 years." *See Zipes Decl. Ex. F* (June 14

Email Chain).

23. The Debtor has some tax law experience. For example, the Debtor testified, under penalty of perjury: "I got an A+ in Stephen Zorn's law class. Stephen's role was a senior partner at Sullivan and Cromwell in the tax department, and he actually asked me to do his tax return." *See Zipes Decl. Ex. A* (Complaint at Ex. F (relevant portions of transcription of Sept. 2023 Tr. at 18:6-11)).

24. The Debtor further testified, "I took tax law in school, I got an A plus, I worked with Senior Cromwell, I got an A plus, so good that he wanted me to do his tax returns." *See Zipes Decl. Ex. A* (Complaint at Ex. B (relevant portions of transcription of Jan. 2024 Ex. at 16:17-19)).

AUST Zipes makes another false statement - Debtor of course DID

25. The Debtor did not maintain books and records of his business. For example, the following exchange took place at an examination of the Debtor:

maintain books and records of his business, and gave whatever he had to AUST Zipes in a timely fashion - they also exist today in storage at "Piece of Cake" moving and storage in New York City, and AUST Zipes is still free to go whenever he chooses, just like he was since we filed these bankruptcy cases in February 2023 at our 30 Wall Street address.

No,  
Manchanda  
Law Office  
PLLC was  
officially  
dissolved in  
November/  
December  
2023 after  
filing fro  
chapter 7  
bankruptcy.

AUST Greg Zipes once again uses hyperbole and exaggeration, if not deception here, because Debtor never stated that he "worked with Senior Cromwell," whatever the hell that means, and Debtor never said "so good that he wanted me to do his tax returns" as it was a class assignment.

Q: If someone was to ask you about the books and records of your law firm, would you refer them to your accountant in that scenario?

A. Books and records?

Q. Yes.

A. Yes.

Q. In your home office or on Wall Street, that Wall Street address there are no books and records as such?

A. No, my accountant has all that information, details, diaries receipts, all those. Go right to them every year.

Yes during the tax return season it was Debtor's practice to send any and all original receipts, diaries, financials, bank statements, checks to our bookkeeper/CPA/accountants for tax return preparation.

Jan. 2024 Tr, at 159-160.

26. The Debtor has used Manchanda Law Firm bank accounts to pay personal expenses, including these:

A Schedule C tax return allows certain expenses that are either business or personal but duly categorized at the tax return stage.

Any and all expenses and purchases were properly and duly treated by our bookkeeper/CPA/Accountants Michael Arons and/or Marc Albaum for many years if not decades, with no audits.

- two purchases at a jeweler, Swarovski 182 (Manchanda Law Office PLLC Citi Account ending 3516) (Mar. 10, 2020 and Dec. 31, 2020);
- purchases at wine and liquor stores (Citi Account ending 3516) (Mar. 24, 2020);
- a purchase at athletic outfitter Adidas (Citi Account ending 3516) (June 3, 2020);
- expenses paid to doctors, emergency medical services, and urgent care centers (Citi Account ending 3516, Manchanda Law Office PLLC TD Account ending 5143, and Manchanda Law Office, M&T Account ending 2686) (Jan. 23, 2020, Apr. 20, 2020, Oct. 22, 2020, Oct. 26, 2020, Oct. 27, 2020, Oct. 28, 2020, Feb. 25, 2021, June 9, 2022); and
- family portraits (M&T Account ending 2686) (Aug. 17, 2022).

27. The Debtor claimed that certain expenses on a non-business bank account, among others, were in fact business expenses, including the following:

Any and all expenses and purchases were properly and duly treated either as business or income by our bookkeeper/CPA/Accountants Michael Arons and/or Marc Albaum for many years if not decades, with no audits.

- A payment of \$19.95 to television streaming service Netflix;
- A payment of \$352.76 to clothing and accessories store Coach, Inc.; and
- A payment of \$325 to Green Village Landscaping, Inc.

Once again AUST Greg Zipes uses hyperbole and lies to describe Debtor. Specifically, the Debtor provided the United States Trustee with Manchanda Law Firm bank hurriedly marking to the best of his statements in which he has identified in his own handwriting what expenses are "business" and memory what purchases were what expenses are "personal."

28. The Debtor has attempted to recreate some books and records during this case.

may not have been so that his bookkeeper/CPA/Accountant could hurriedly prepare a Profit & Loss in preparation for his official tax return in July 2023, when it was actually due in October 2023 due to his duly filed extension, but was pushed, threatened, coerced, and harangued by AUST Greg Zipes and AUSA Dana Walsh Kumar to get them filed faster to meet their "court approved deadline." Later on, Debtor on his own asked his bookkeeper/CPA/Accountant to voluntarily review in-depth and amend any errors, mistakes which they promptly did.

29. On Schedule I, the Debtor states that his net monthly income from “rental property and from operating a business, profession, or farm,” is \$4,250. *See* ECF Doc. No. 5, Sch. I. According to the Debtor, after including the income of “Debtor 2 or non-filing spouse,” his total monthly income is \$7,527.53. *Id.*

30. The Debtor claimed, under penalty of perjury, that his monthly net expenses were \$7,535.00. *See* ECF Doc. No. 5, Sch. J. This figure includes two monthly car payments – one that costs the Debtor \$624 each month, and one that costs the Debtor \$771 per month – and \$1,200 each month for food and housekeeping supplies (together, the “Claimed Expenses”). *Id.*

31. The Claimed Expenses resulted in a claimed monthly deficit of \$7.47. *See* ECF Doc. No. 5, Sch. J (Item 23c).

32. On his SOFA, the Debtor lists, under penalty of perjury, “gross” business revenue (1) during the roughly one-month period of January 1, 2023 through the Filing Date in the amount of \$4,500, (2) for the prior year, 2022, as \$52,000, and (3) for 2021 as \$51,999. *See* Zipes Decl. Ex. B (SOFA, Question 2)

33. The Debtor has never provided documentary proof to the United States Trustee on how he arrived at the “gross” revenue for his business, as reflected in the SOFA.

34. The Debtor has made many assertions regarding his earnings, including that “we often grossed \$50-\$150,000 per month for years.” *See* Zipes Decl. Ex. G (Answer at ¶ 32).

35. The Debtor has never provided documentary proof to the United States Trustee on how he arrived at the “\$50-\$150,000 per month.”

36. The Debtor values his sole proprietorship in the Manchanda Law Firm at \$100. *See* Zipes Decl. Ex. H (ECF Doc. No. 13, Amended Sch. A/B at 4).

“Debtor”  
should read  
“Debtor’s  
attorney  
Bruce  
Bronson”

“Debtor”  
should read  
“Debtor’s  
attorney  
Bruce  
Bronson”

Debtor has  
provided  
AUST Zipes  
years and  
years of bank  
statements  
wherein some  
months show  
this dollar  
figure.

“Debtor”  
should read  
“Debtor’s  
attorney Bruce  
Bronson”

“Debtor”  
should read  
“Debtor’s  
attorney Bruce  
Bronson” but  
his duly  
submitted tax  
returns should  
suffice.

Again,  
“Debtor”  
should read  
“Debtor’s  
attorney Bruce  
Bronson”

Once again  
AUST  
Greg Zipes uses  
hyperbole and  
lies to describe  
Debtor  
hurriedly  
marking to the  
best of his  
memory what  
purchases were  
business and  
what may not  
have been so  
that his  
bookkeeper/  
CPA/  
Accountant  
could hurriedly  
prepare a Profit  
& Loss in  
preparation for  
his official tax  
return in July  
2023, when it  
was actually  
due in October  
2023 due to his  
duly filed  
extension, but  
was pushed,  
threatened,  
coerced, and  
harangued by  
AUST Greg  
Zipes and  
AUSA Dana  
Walsh Kumar  
to get them  
filed faster to  
meet their  
"court  
approved  
deadline."  
Later on,  
Debtor on his  
own asked his  
bookkeeper/  
CPA/  
Accountant to voluntarily review in-depth and amend any errors, mistakes which they promptly did.

37. The Debtor has never provided documentary proof on how he arrived at the valuation of his law firm.

38. The Debtor personally has marked certain personal bank statements with notations indicating his belief that certain items on those personal bank statements were business expenses. *See* Zipes Decl. Ex. A (Complaint at Ex. B, Jan. 2024 Transcript, at 49:9-12).

#### **E. The Debtor's Assets and Liabilities**

39. The Debtor scheduled and stated under penalty of perjury, total assets of \$871,601, including: (i) the New Rochelle Property valued at \$845,265, (ii) a 2018 BMW 320i valued at \$11,336, (iii) household goods and furnishings valued at \$5,000, (iv) electronics valued at \$2,000, (v) clothes valued at \$2,000, (vi) jewelry valued at \$300, (vii) cash on hand of \$5,800, and (xiii) the full ownership of the Manchanda Law Firm valued at \$100. (*See* ECF Doc. No. 13, Sch. A/B).

40. In the bankruptcy filing for *Manchanda Law Office PLLC* ("Manchanda Law"), Case No. 23-11805 (SHL) (the "Manchanda Bankruptcy Case"), which the Manchanda Law Firm, as controlled exclusively by the Debtor, filed *pro se* on November 13, 2023, the Manchanda Law Firm listed accounts receivables with a "Current" value of \$253,217. *See* No. 23-11805, ECF Doc. No. 1 (Sch. A/B, Question 11).

41. "Quontickbk" is listed as the secured creditor of the New Rochelle Property, and this debt was incurred on "2022-07." *See* Zipes Decl. Ex. B (No. 23-11805, ECF Doc. No. 1, Sch. D, item 2.4).<sup>1</sup>

42. The Manchanda Law Firm scheduled \$1,501,230 in total liabilities. *See* No. 23-11805, ECF Doc. No. 1, Sch. D.

"Debtor" should read "Debtor's attorney Bruce Bronson" but we assume he pays expert valiators.

"Debtor" should read "Debtor's attorney Bruce Bronson"

"Debtor" should read "Debtor's attorney Clayton Everett"

<sup>1</sup>Although the Manchanda Law Firm amended certain schedules, it did not amend the original Schedule D.

43. The Manchanda Law Firm scheduled secured debt in the total amount of \$835,055, including a mortgage of \$661,950 and an Internal Revenue Service claim of \$122,957.

*Id.*

44. The Manchanda Law Firm scheduled unsecured debt in the total amount of \$666,175, including a loan of \$500,000 from the Small Business Administration (the “SBA”) and student loans of \$145,184. *See Zipes Dec. Ex. H* (No. 23-11805, ECF Doc. No. 13, Sch. F).

#### **F. Discovery**

45. On April 20, 2023, the United States Trustee filed an application (the “2004 Application”) pursuant to Bankruptcy Rule 2004, directing the Debtor to produce certain documents and to appear for an examination to answer any and all questions relating to the acts, conduct or property or to the liabilities and financial condition of the Debtor, or to any matter which may affect the administration of his bankruptcy estate, or to his right to a discharge. *See ECF Doc. No. 30.*

46. Over the objection of the Debtor (ECF Doc. No. 27), the Court entered an order granting the United States Trustee’s 2004 Application on June 1, 2023 (the “2004 Order”). *See ECF Doc. No. 45.*

47. Pursuant to the 2004 Order, the Debtor was required to produce certain documents and information to the United States Trustee within 21 days from the date of entry of the 2004 Order (*i.e.*, no later than June 22, 2023). *See Zipes Decl. Ex. I.*

48. Those documents included:

4) All documents showing how the Debtor calculated income on Schedule I [ECF Docket No. 5]. The Debtor indicates on Schedule I that his net income from “rental property and from operating a business, profession, or farm” is \$4,250. After including the income of “Debtor 2 or non-filing spouse” the total monthly income is \$7,527.53. The Debtor should provide all documents in connection with the income amounts listed in Schedule I.

“Debtor”  
should read  
“Debtor’s  
attorney Bruce  
Bronson”

5) All documents relating to applications for credit, loans, or letters of credit submitted by the Debtor to credit or financial institutions for two (2) years prior to the Filing Date, as well as all documents relating to applications for credit, loans, or letters of credit submitted by the Debtor with respect to all outstanding credit or loan obligations existing at or after the time of the Filing Date to the present.

*See 2004 Order, Document Request, Questions 4 and 5.*

49. In a rolling production, the Debtor produced some, but not all, of the documents required pursuant to the 2004 Order, on the following dates: May 30, 2023; June 24, 2023; July 18, 2023; and August 6, 2023.

50. A chart showing the documents produced by the Debtor is attached to the Zipes Decl. Ex. A (Complaint at Ex. D (the “Document Production Chart”)).

51. The Document Production Chart was sent to the Debtor for review and approval on August 1, 2023, over seven weeks in advance of his scheduled examination. *See Zipes Decl. Ex. A (Complaint at Ex. E).*

52. Before his scheduled examination in September 2023, the Debtor did not provide any comments or changes to the Document Production Chart.

53. On December 12, 2023, over the Debtor’s objection, the Court authorized the United States to subpoena information about the Debtor’s finances directly from TD Bank, N.A., Citibank, N.A., and M&T Bank. *See ECF Doc. No. 93 (the “Subpoena Order”).*

54. In his application for the Subpoena Order, the United States Trustee alleged that “[t]he bank statements the Debtor has produced to date are incomplete, and the Debtor has not provided sufficient documentation relating to the \$500,000 SBA loan that his law firm received or about the source of the funds he used to purchase his home in July 2022.” *See ECF Doc. No. 80 (Introduction).*

Debtor produced whatever he could produce to the fullest and best of his ability, even traveling to various banks to pick certain materials up if they were incomplete or missing in his own books and records, but many would not release unless Debtor attorney Bruce Bronson consented, which he never did even after he withdrew.

Debtor did not comment or change the Document Production Chart because he did not understand it - looked like Chinese to him.

55. At the Debtor's request, the Debtor's initial examination pursuant to Bankruptcy Rule 2004, held on September 20, 2023 (the "September Examination"), took place via Zoom and not in person. Present at that remote examination were counsel to the United States Trustee and an Assistant United States Attorney who represented the SBA and the Internal Revenue Service.

56. During the September Examination, the Debtor testified under penalty of perjury.

57. At the examination, the Debtor refused to answer the question: "Did you sign this petition under penalties of perjury?" *See* Sept. 2023 Tr. at 33-37.

58. The Debtor's examination began but had to be adjourned at the request of the transcriber. *See* Zipes Decl. Ex. A (Complaint at Ex. A, Sept. 2023 Tr., at 90:23-25; 91:1-25; and 92:1).

59. At such time, counsel to the United States Trustee and the Assistant United States Attorney indicated that they had not completed asking the Debtor questions. *Id.* Sept. 2023 Tr., at 89:24-90:4, and 90:9-12.

60. The Debtor agreed to a continuation of his examination in-person at the Courthouse on November 6, 2023.

61. However, the Debtor did not appear at the examination on November 6, 2023. *See* ECF Doc. No. 84, Nov. 7 Tr. at 3-4:8.

62. The Debtor also failed to appear at a Zoom conference scheduled to consider discovery issues and held on November 7, 2023. *Id.*

63. The Debtor's continued examination took place on January 26, 2024 in person at the Courthouse at which time it was completed.

Debtor did not "refuse" to answer anything, just could not attest to electronic signatures or things that he did not recognize.

Yes Debtor was suffering from severe medical emergency illness for which he provided medical emergency documents/ proof.

#### **G. The Covid Loan**

64. On or about July 21, 2024, the Debtor signed a loan application with the U.S.

Small Business Administration on behalf of the Manchanda Law Firm (the "Loan Application").

*See Zipes Decl. Ex. J (loan documents).*

65. The Loan Application set forth a payment of \$500,000 to the Manchanda Law Firm (the "Covid Loan").

66. According to the Loan Application, the "Borrower will obtain and itemize receipts (paid receipts, paid invoices or cancelled checks), and contracts for all Loan funds spent and retain these receipts for 3 years from the date of the final disbursement."

67. According to the Loan Application, the "Borrower will not use, directly or indirectly, any portion of the proceeds of this Loan to relocate without the prior written permission of SBA."

68. According to the Loan Application, the "Borrower will use all the proceeds of this Loan solely as working capital to alleviate economic injury caused by disaster occurring in the month of January 31, 2020 and continuing thereafter . . ." *See Loan Application.*

69. The Debtor individually guaranteed the Covid Loan. *See Amended Loan Authorization and Agreement at 3.*

70. The Debtor has not fully accounted for the proceeds of the Loan Application during this case.

71. The parties in this case have established that there was a "Universal Withdrawal" receipt from the Manchanda Law M&T account on July 6, 2022, which shows a \$180,157.27 withdrawal (the "\$180,157.27 Withdrawal").

72. The \$180,157.27 Withdrawal was used to pay for the New Rochelle Property. Due to the fluidity and mature of liquid money, it is hard to tell when the loan ands and Debtor's law firm business income begins due to routine monthly gross incomes of \$50,000-\$150,000 for many years AFTER SBA loan approval and disbursement in 2020, according to Debtor's financial advisory Jayanthi Ganapathy of FinAccurate company, as well as Debtor's bookkeepers/CPAs/Accountants, and lawyers.

Debtor does not recall signing anything as he had financial advisors Jake Rotman from SBG Funding, Jayanthi Ganapathy from FinAccurate handle all SBA government loans for compliance and a large fee.

As stated above, the SBA loan was approved and received many years before Joe Biden's economy and inflation forced Debtor and his family and baby to relocate from Manhattan to New Rochelle NY due a new inability to afford working/living in Manhattan anymore.

In contrast to AUST Zipes' lies, Debtor has fully accounted for the proceeds of the Loan within his tax returns and financial statements.

Debtor used the funds for exactly this purposes, including but not limited to hiring and paying 10-20 employees for many years from SBA funds, as well as rent, insurance, office supplies, advertising, marketing, bonuses and gifts and weekly lunches for his hardworking staff, etc

73. The Debtor understands that the Covid Funds the Manchanda Firm received must

be used for business related purposes.

All SBA Funds were used for business related purposes to the fullest extent possible per his tax returns and in accordance with law.

74. According to the Debtor's testimony at the Creditors' Meeting, the New Rochelle

Property was purchased by the Debtor and his wife on or about July 6, 2022. *See Zipes Decl.*

Ex. A (Complaint at Ex. C (Creditors' Meeting Tr.), at 8:3).

75. The New Rochelle Property was not purchased by the Manchanda Law Firm.

76. The New Rochelle Property has three bedrooms and a kitchen. *See Zipes Decl.*

Ex. A (Complaint at Ex. B (Jan. 2024 Tr., at 7:1-4)).

The New Rochelle Property was purchased on Debtor's Schedule C tax return for the law firm Manchanda Law per his bookkeepers/ CPA/ Accountants and lawyers.

77. The Debtor claimed a homestead exemption under penalty of perjury on his

Schedules of \$179,975 for the New Rochelle Property. *See Zipes Decl.* Ex. H (Sch. C).

78. The Debtor testified that, “[he] used [the New Rochelle Property] exclusively –

[he] would say 90 percent of the property [is used] – for meeting with clients, working on clients' cases, doing legal research”. *See Zipes Decl.* Ex. A (Complaint at Ex. A, Sept. 2023 Tr.

at 12:17-21).

79. When Plaintiff's counsel asked the Debtor to confirm that it was his testimony that 90 percent of the New Rochelle Property is used for business, the Debtor responded:

“Yes. Yes.”

*See Sept. 2023 Tr. at 14.*

80. The Debtor has also stated, “I work on nearly every floor of the home law office.”

*See Zipes Decl.* Ex. G (Answer at ¶ 22).

81. The closing documents relating to the New Rochelle Property indicate that it is a residential property. *See Zipes Decl.* Ex. K.

## G. The Adversary Proceeding

property, and many small businesses operate in Debtor's neighborhood including Debtor's 5 year old son's school teacher/ Montessori owner who lives a few blocks away plus has an office in a nearby church, plus the Ward School where Debtor's son goes now only a few blocks away as well,

Again, Debtor is unaware of any zoning prohibitions on said

82. On March 25, 2024, the United States Trustee filed the Adversary Proceeding Complaint.

83. On March 29, 2024, the Debtor filed an answer (the "Answer").

84. The Debtor's Answer did not admit, deny, or assert a lack of knowledge as to each allegation in the Complaint. *See Answer.*

85. In his Answer, the Debtor blamed others for his inability to explain aspects of his Schedules.

86. For example, the Debtor stated that he does not know why he signed Schedules valuing the Manchanda Law Firm at \$100.

Debtor to this day has no reason to believe that Bruce Bronson and his expert valuations were inaccurate or incorrect, so he did not change them.

87. At a hearing held on May 16, 2023, after the Debtor started appearing as a *pro se* debtor, the Court advised the Debtor that he could further amend the Schedules or SOFA if the Debtor believed they needed amendments:

So, I do understand Mr. Manchanda's comment that he didn't prepare the Petition and that the \$100 [value of the law firm] is Mr. Bronson's number. I can understand that. And so what I think I would suggest of Mr. Manchanda is to take a look at the bankruptcy filing, the Petition and the schedules. Get yourself familiar with them. And if they need to be amended to reflect what you think is proper, then you should do that. And the idea is to get information and transparency. So if the number you think Mr. Bronson chose is incorrect, you should change that number and amend the schedules and information.

*See ECF Doc. No. 43, May 16 Tr. at 44:6-15.*

Debtor to this day has no reason to believe that Bruce Bronson and his expert valuations were inaccurate or incorrect, so he did not change them. If glaring errors brought to his attention by AUST Zipes or AUSA Kumar exist Debtor filed complaints with government

88. Following the Court's statements on May 16, 2023, the Debtor did not file any further amendments to the Schedules or SOFA. To date, the Debtor has not amended his Schedules or SOFA.

Debtor has not received any appeal information even though he filed complaints

89. The Debtor's appeals and requests for sanctions have all been denied by this Court or Courts on appeal.

90. Most recently, the Second Circuit has stated as follows:

agencies, law enforcement, or disciplinary committees while also asking those preparers to correct their work if necessary.

Upon due consideration, it is hereby ORDERED that Appellant's motion is DENIED, the Federal Appellees' motion is GRANTED, and the appeal is DISMISSED because it "lacks an arguable basis either in law or in fact." Neitzke v. Williams, 490 U.S. 319, 325 (1989); see Pillay v. INS, 45 F.3d 14, 16–17 (2d Cir. 1995) (per curiam).

Institutional corruption and incompetence is a hard nut to crack, and goes up very high in this state and city.

*See Zipes Decl. Ex. L* (Case 24-395, September 25, 2024, Dkt. Entry 50.1).

#### **H. The Debtor's Prior Bankruptcy Filings**

91. On October 4, 2011, the Debtor filed a voluntary petition *pro se* under Chapter 7

We have already explained to AUST Zipes that the vast majority of erroneous filings were either mistakes, errors, incomplete, prepared and filed by incompetent lawyers such as Julio Portilla and many others. Debtor should not be penalized for their work.

of the Bankruptcy Code. Case No. 11-14666-smb. This case was dismissed on January 8, 2012.

*See No. 11-14666, ECF Doc. No. 33.*

92. On September 3, 2013, the Debtor filed a second petition under Chapter 7 of the

Bankruptcy Code. Case No. 13-12880-mg. In that case, the Debtor's obligations were discharged through the Chapter 7 process on January 13, 2014. *See No. 13-12880, ECF Doc. No. 64.*

93. Less than four months later, on April 30, 2014, the Debtor filed a third petition,

this time under Chapter 13 of the Bankruptcy Code. Case No. 14-11259-jlg. The Debtor's petition was dismissed on January 7, 2015. *See No. 14-11259, ECF Doc. No. 32.*

94. One year later, on January 29, 2016, the Debtor filed another Chapter 13 petition. Case No. 16-10222-jlg. The Debtor's petition was dismissed on January 27, 2017. *See* No. 16-10222, ECF Doc. No. 187.

Dated: New York, New York  
November 20, 2024

WILLIAM K. HARRINGTON  
UNITED STATES TRUSTEE

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